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10  
11 **UNITED STATES DISTRICT COURT**  
12  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14

15 AS YOU SOW, a 501 (c)(3) non-profit  
16 corporation,

17 Plaintiff,

18 v.

19 ETSY, INC., and DOES 1-20, inclusive  
20 Defendants,  
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Case No. 24-cv-04203-MMC

**STIPULATION REGARDING  
PROPOSED CASE MANAGEMENT  
AND BRIEFING SCHEDULE**

Date: October 11, 2024

Time: 9:00 a.m.

Dept: Courtroom 7, 19<sup>th</sup> Floor

Federal District Court

450 Golden Gate Ave.

San Francisco, CA 94102

Judge: Hon. Maxine M. Chesney, presiding

**RECITALS**

WHEREAS the initial Complaint in this matter was filed with the California Superior Court for the County of Alameda on June 11, 2024, and

WHEREAS Defendants were served with a summons and Plaintiff's Complaint for Injunctive Relief on June 18, 2024, and

WHEREAS the matter was removed to this Court on July 11, 2024, and

WHEREAS Plaintiff intends to file a motion to remand the matter to state court, and

WHEREAS motions to Dismiss and to Compel Arbitration or for Change of Venue are currently pending before this Court, and

WHEREAS a Case Management Conference has been scheduled by Court order for October 25, 2024, and

WHEREAS 28 U.S.C. § 1447(c) provides that "a motion to remand the case on the basis of any defect other than lack of subject matter jurisdiction must be made within 30 days after the filing of the notice of removal," and

WHEREAS Civil Local Rule § 6-1(a) provides that "Parties may stipulate in writing, without a Court order...to enlarge or shorten the time in matters not required to be filed or lodged with the Court, provided the change will not alter the date of any event or any deadline already fixed by Court order," and

WHEREAS Defendant has expressed a preference that all three matters be heard on the same date (motions for remand, dismissal, arbitration).

**STIPULATION**

Plaintiff AS YOU SOW and Defendant ETSY, INC. (collectively the "Parties") hereby stipulate to the following coordinated briefing schedule:

1. Plaintiff AS YOU SOW's Motion to Remand will be due on or before **July 30, 2024**;
2. Defendant ETSY's opposition to Plaintiff's Motion to Remand and Plaintiff AS YOU SOW's opposition briefs to Defendant Esty's Motions to Dismiss and to Compel Arbitration will be due on or before **August 20, 2024**;

3. Plaintiff AS YOU SOW's reply in support of its Motion to Remand and Defendant ETSY's reply briefs in support of Etsy's Motions to Dismiss and to Compel Arbitration will be due on or before **September 17, 2024**;

4. A hearing on the pending motions to Dismiss, Compel Arbitration and to Remand will be held on **October 11, 2024**, at **9:00 a.m.**, or as soon thereafter as the Court shall order, before the Honorable Maxine M. Chesney.

IT IS SO STIPULATED.

Respectfully Submitted,

Dated: July 25, 2024

/s/ Rachel Doughty  
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Dated: July 25, 2024


/s/ Nicholas J. Hoffman  
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*Attorneys for Defendants*

Under N.D. Cal. Local Rule 5-1(i)(3), in lieu of a signature, I attest that I obtained approval, on July 26, 2024, from Nicholas J. Hoffman for the filing of this declaration.

/s/ Rachel S. Doughty  
Rachel S. Doughty  
*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY certify that on July 26, 2024, I electronically filed and served the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California using the CM/ECF system, which will send notification of this filing to the attorneys of record.

  
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Jessica San Luis